

## CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

## PLAINTIFFS

Elizabeth Roman, Herman Jiminian, Jeanette Feliciano, Albin Dulcet, and Maria Moreira

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)  
Newman Ferrara LLP, 1250 Broadway, 27th Fl, New York, NY 10001, tel. (212) 619-5400

Seelig Law Offices, LLC, 299 Broadway, Ste 1600, New York, NY 10007,  
CAUSE OF ACTION

18 U.S.C. § 1962

Has this action, case, or proceeding, or one essentially the same been previously filed in SDNY at any time? No  Yes

Judge Previously Assigned

If yes, was this case Vol.  Invol.  Dismissed. No  Yes  If yes, give date \_\_\_\_\_ & Case No. \_\_\_\_\_

## IS THIS AN INTERNATIONAL ARBITRATION CASE?

No  Yes

(PLACE AN [x] IN ONE BOX ONLY)

## NATURE OF SUIT

		TORTS	ACTIONS UNDER STATUTES			
CONTRACT		PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
[ ] 110	INSURANCE	[ ] 310 AIRPLANE	[ ] 367 HEALTHCARE/PHARMACEUTICAL PERSONAL INJURY/PRODUCT LIABILITY	[ ] 625 DRUG RELATED SEIZURE OF PROPERTY	[ ] 422 APPEAL 28 USC 158	[ ] 375 FALSE CLAIMS [ ] 376 QUI TAM
[ ] 120	MARINE	[ ] 315 AIRPLANE PRODUCT LIABILITY	[ ] 365 PERSONAL INJURY	21 USC 881	[ ] 423 WITHDRAWAL 28 USC 157	[ ] 400 STATE REAPPORTIONMENT
[ ] 130	MILLER ACT	[ ] 320 ASSAULT, LIBEL & SLANDER	[ ] 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY	[ ] 690 OTHER		[ ] 410 ANTITRUST [ ] 430 BANKS & BANKING
[ ] 140	NEGOTIABLE INSTRUMENT	[ ] 330 FEDERAL EMPLOYERS' LIABILITY				[ ] 450 COMMERCE [ ] 460 DEPORTATION
[ ] 150	RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT	[ ] 340 MARINE				[ ] 470 RACKETEER INFLUENCED & CORRUPT ORGANIZATION ACT (RICO)
[ ] 151	MEDICARE ACT	[ ] 345 MARINE PRODUCT LIABILITY				[ ] 480 CONSUMER CREDIT [ ] 490 CABLE/SATELLITE TV
[ ] 152	RECOVERY OF DEFULTED STUDENT LOANS (EXCL VETERANS)	[ ] 350 MOTOR VEHICLE	[ ] 370 OTHER FRAUD			
		[ ] 355 MOTOR VEHICLE PRODUCT LIABILITY	[ ] 371 TRUTH IN LENDING			
[ ] 153	RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS	[ ] 360 OTHER PERSONAL INJURY	[ ] 380 OTHER PERSONAL PROPERTY DAMAGE	LABOR	[ ] 861 HIA (1395f) [ ] 862 BLACK LUNG (923) [ ] 863 DIWC/DIWV (405(g)) [ ] 864 SSID TITLE XVI [ ] 865 RSI (405(g))	[ ] 850 SECURITIES/ COMMODITIES/ EXCHANGE
[ ] 160	STOCKHOLDERS SUITS	[ ] 362 PERSONAL INJURY - MED MALPRACTICE	[ ] 385 PROPERTY DAMAGE	[ ] 710 FAIR LABOR STANDARDS ACT		[ ] 890 OTHER STATUTORY ACTIONS
[ ] 190	OTHER CONTRACT			[ ] 720 LABOR/MGMT RELATIONS		[ ] 891 AGRICULTURAL ACTS
[ ] 195	CONTRACT PRODUCT LIABILITY			[ ] 740 RAILWAY LABOR ACT		
[ ] 196	FRANCHISE	ACTIONS UNDER STATUTES		[ ] 751 FAMILY MEDICAL LEAVE ACT (FMLA)		
		CIVIL RIGHTS	[ ] 530 HABEAS CORPUS	[ ] 790 OTHER LABOR	[ ] 1870 TAXES (U.S. Plaintiff or Defendant)	[ ] 893 ENVIRONMENTAL MATTERS
			[ ] 535 DEATH PENALTY	LITIGATION	[ ] 871 IRS-THIRD PARTY	[ ] 895 FREEDOM OF INFORMATION ACT
			[ ] 540 MANDAMUS & OTHER	[ ] 791 EMPL RET INC SECURITY ACT (ERISA)	26 USC 7609	[ ] 896 ARBITRATION [ ] 899 ADMINISTRATIVE PROCEDURE ACT/REVIEW OR APPEAL OF AGENCY DECISION
						[ ] 950 CONSTITUTIONALITY OF STATE STATUTES
REAL PROPERTY						
[ ] 210	LAND CONDEMNATION	[ ] 441 VOTING				
		[ ] 442 EMPLOYMENT				
		[ ] 443 HOUSING/ACCOMMODATIONS	PRISONER CIVIL RIGHTS			
[ ] 220	FORECLOSURE	[ ] 445 AMERICANS WITH DISABILITIES - EMPLOYMENT	[ ] 550 CIVIL RIGHTS	[ ] 462 NATURALIZATION APPLICATION		
[ ] 230	RENT LEASE & EJECTMENT		[ ] 555 PRISON CONDITION	[ ] 465 OTHER IMMIGRATION ACTIONS		
[ ] 240	TORTS TO LAND	[ ] 446 AMERICANS WITH DISABILITIES - OTHER	[ ] 560 CIVIL DETAINEE CONDITIONS OF CONFINEMENT			
[ ] 245	TORT PRODUCT LIABILITY					
[ ] 290	ALL OTHER REAL PROPERTY	[ ] 448 EDUCATION				

Check if demanded in complaint:

CHECK IF THIS IS A CLASS ACTION  
UNDER F.R.C.P. 23

DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y.  
AS DEFINED BY LOCAL RULE FOR DIVISION OF BUSINESS 13?  
IF SO, STATE:

DEMAND \$ \_\_\_\_\_ OTHER \_\_\_\_\_ JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

Check YES only if demanded in complaint  
JURY DEMAND:  YES  NO

NOTE: You must also submit at the time of filing the Statement of Relatedness form (Form IH-32).

(PLACE AN X IN ONE BOX ONLY)

- |   |   |  |   |  |   |   |
|---|---|--|---|--|---|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from (Specify District) | <input type="checkbox"/> 6 Multidistrict Litigation (Transferred) | <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge |
| <input type="checkbox"/> a. all parties represented       |   |  |   |  |   |   |
| <input type="checkbox"/> b. At least one party is pro se. |   |  |   |  |   |   |
- 8 Multidistrict Litigation (Direct File)

(PLACE AN X IN ONE BOX ONLY)

- 1 U.S. PLAINTIFF     2 U.S. DEFENDANT     3 FEDERAL QUESTION     4 DIVERSITY  
(U.S. NOT A PARTY)

IF DIVERSITY, INDICATE CITIZENSHIP BELOW.

## CITIZENSHIP OF PRINCIPAL PARTIES (FOR DIVERSITY CASES ONLY)

(Place an [X] in one box for Plaintiff and one box for Defendant)

CITIZEN OF THIS STATE	PTF [X] 1	DEF [X] 1	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF DEF [ ] 3 [ ] 3	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF [ ] 5	DEF [ ] 5
CITIZEN OF ANOTHER STATE	[ ] 2	[ ] 2	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	[ ] 4 [ ] 4	FOREIGN NATION	[ ] 6	[ ] 6

## PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

c/o Newman Ferrara LLP, 1250 Broadway, 27th Fl., New York, NY 10001 (New York County)

## DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

Norman Seabrook, Elias Husamudeen, Joseph Bracco, Elizabeth Castro, Michael Maiello, Amelia Warner, Thomas Farrell, Karen Tyson, Benny Boscio, Kenyatta Johnson, Albert Craig, Daniel Palmeiri, Angel Castro, Frederic Fusco, and Paulette Bernard: c/o COBA, 75 Broad Street, Ste 810, New York, NY 10004 (New York County)

Platinum Management (NY) LLC, Murray Huberfeld, David Bodner, Mark Nordlicht: c/o Platinum Management (NY) LLC, 152 W 57th St., 54th Fl., New York, NY 10019 (New York County), Koehler & Isaacs, LLP, 61 Broadway, New York, NY 10006 (New York County), Daniel H. Cook Assoc., 253 W 35th St, New York, NY 10001 (New York County), Buchbinder Tunick & Co, One Pennsylvania Plaza, Ste 5335, New York, NY 10119 (New York County), Sterling Valuation Group, 590 Madison Ave # 504, New York, NY 10022

## DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

Jona Rechnitz and Jeremy Reichberg

## COURTHOUSE ASSIGNMENT

I hereby certify that this case should be assigned to the courthouse indicated below pursuant to Local Rule for Division of Business 18, 20 or 21.

DO NOT check either box if this is a PRISONER PETITION/PRISONER CIVIL RIGHTS COMPLAINT.

Check one: THIS ACTION SHOULD BE ASSIGNED TO:  WHITE PLAINS  MANHATTAN

DATE	SIGNATURE OF ATTORNEY OF RECORD	ADMITTED TO PRACTICE IN THIS DISTRICT [ ] NO [X] YES (DATE ADMITTED Mo. 04 Yr. 1998) Attorney Bar Code # NY 2885978
RECEIPT #		

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge \_\_\_\_\_ is so Designated.

Ruby J. Krajick, Clerk of Court by \_\_\_\_\_ Deputy Clerk, DATED \_\_\_\_\_.

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)